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*Attorneys for Defendants Edward Christopher
Sheeran, Atlantic Recording Corporation and
Sony/ATV Music Publishing LLC*

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

KATHRYN TOWNSEND GRIFFIN, HELEN
MCDONALD, and THE ESTATE OF CHERRIGALE
TOWNSEND,

Plaintiffs,

-against-

EDWARD CHRISTOPHER SHEERAN, p/k/a ED
SHEERAN, ATLANTIC RECORDING
CORPORATION, d/b/a ATLANTIC RECORDS,
SONY/ATV MUSIC PUBLISHING, LLC, and
WARNER MUSIC GROUP CORPORATION, d/b/a
ASYLUM RECORDS

Defendants.

ECF CASE

17-cv-5221 (LLS)

**NOTICE OF MOTION –
DEFENDANTS’ FOURTH
MOTION *IN LIMINE***

PLEASE TAKE NOTICE, that upon the accompanying Declaration of Donald S. Zakarin dated September 4, 2020 and the Exhibits annexed thereto, the accompanying Memorandum of Law, and all prior proceedings had herein, Defendants Edward Christopher Sheeran (“Sheeran”), Atlantic Recording Corporation (“Atlantic”) and Sony/ATV Music Publishing LLC (“SATV,” together with Atlantic and Sheeran, the “Defendants” and each a “Defendant”) will move this Court, before the Honorable Louis L. Stanton at the Daniel Patrick Moynihan United States Courthouse, Courtroom 21C, 500 Pearl Street, New York, New York, 10007, on a date and time to be determined by the Court,

for an Order: (1) excluding any argument or evidence relating to the Spin Article (as defined in the accompanying papers and annexed to the Zakarin Declaration as Exhibit 1) and the Billboard Article (as defined in the accompanying papers and annexed to the Zakarin Declaration as Exhibit 2); and (2) excluding any argument or evidence relating to the liner notes for the *Let's Get It on* (Deluxe) Album.

The reasons and grounds for this motion are more fully described in the accompanying papers.

Oral argument, if any shall be directed by the Court, shall be held on a date and at a time designated by the Court.

Dated: New York, New York
September 18, 2020

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By: /s/ Donald S. Zakarin
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